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2 GUY P. GLAZIER, SBN 162628
3 DEBORAH M. PARKER, SBN 228203
4 707 Wilshire Boulevard, Suite 2025
5 Los Angeles, California 90017
6 Telephone: 213-312-9200
7 Facsimile: 213-312-9201
8 E-mail: glazier@glazierjee.com
9 E-mail: parker@glazierjee.com

10 Attorneys for Defendant
11 LOCKHEED MARTIN CORPORATION

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 PAUL OLDS,

15 Plaintiff,

16 v.

17 3M COMPANY a/k/a MINNESOTA
18 MINING AND MANUFACTURING
19 COMPANY, et al.

20 Defendants.

CASE NO. CV-12-08539 R

Hon. Manuel L. Real

**DECLARATION OF DEBORAH M.
PARKER IN SUPPORT OF EX PARTE
APPLICATION AND MEMORANDUM
BY LOCKHEED MARTIN
CORPORATION FOR AN ORDER TO
CONTINUE THE HEARING DATES
FOR:**

1. **PLAINTIFF'S MOTION TO
COMPEL FURTHER RESPONSES
TO PLAINTIFF'S
INTERROGATORY NOS. 5 and 8
AND LOCKHEED MARTIN'S
REQUEST FOR MONETARY
SANCTIONS AGAINST PLAINTIFF
AND/OR PLAINTIFF'S COUNSEL
IN THE AMOUNT OF \$6,992.50;**
2. **LOCKHEED MARTIN
CORPORATION'S MOTION TO
STRIKE PORTIONS OF
PLAINTIFF'S COUNSEL'S
DECLARATION AND EXHIBIT I;
AND**
3. **PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
OF DEFENDANT LOCKHEED
MARTIN CORPORATION'S
ALLEGED GOVERNMENT
CONTRACTOR DEFENSE**

Filed: October 4, 2012
Trial Date: March 11, 2014

DECLARATION OF DEBORAH M. PARKER

I, Deborah M. Parker, declare as follows:

1. I am an attorney duly admitted to practice in the State of California. I am a partner with the law firm of Glazier Yee LLP and counsel of record for Defendant Lockheed Martin Corporation ("Lockheed Martin"). I am very familiar with the files in this case maintained at my office and maintained at the Court. I have personal knowledge of the facts set forth in this declaration and I could and would testify competently thereto if called upon to do so. I make this declaration in support of the *Ex Parte* Application And Memorandum By Lockheed Martin Corporation For An Order To Continue The Hearing Dates For: 1) Plaintiff's Motion To Compel Further Responses To Plaintiff's Interrogatory Nos. 5 And 8 And Lockheed Martin's Request For Monetary Sanctions Against Plaintiff And/Or Plaintiff's Counsel In The Amount Of \$6,992.50; 2) Lockheed Martin Corporation's Motion To Strike Portions Of Plaintiff's Counsel's Declaration And Exhibit I; And 3) Plaintiff's Motion For Partial Summary Judgment Of Defendant Lockheed Martin Corporation's Alleged Government Contractor Defense ("Application").

2. On June 10, 2013, in compliance with Judge Real's Procedures and Schedules, I caused my office to serve correspondence notifying Plaintiff's counsel and copying all parties that Lockheed Martin intended to file this *ex parte* application and that they had twenty-four (24) hours from actual receipt of the *ex parte* application to file any opposition. Attached hereto as Exhibit A is a true and correct copy of Lockheed Martin's correspondence and transmission receipt dated June 10, 2013.

3. On June 11, 2013, I received an email from Plaintiff's counsel indicating that Plaintiff intended to oppose the *ex parte* application. Attached hereto is a true and correct copy of the email exchange between Plaintiff's counsel and me dated June 11, 2013.

4. On June 10, 2013, I spoke with Court Clerk William Horrell who stated that the proposed hearing date of August 19, 2013, was suitable.

1 5. Lockheed Martin has not requested any other continuances in this case.

2 6. On or before July 22, 2013, Lockheed Martin plans to file a motion for
3 summary judgment, which in large part, will address issues and points of law in
4 common with those raised in Plaintiff's motion for partial summary judgment. This
5 filing date corresponds appropriately to the proposed August 19, 2013 hearing date.

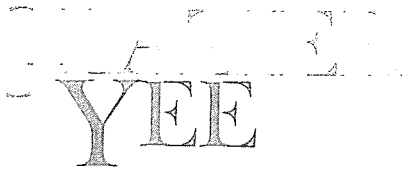
6 7. On February 6, 2013, through the National Park Services, I was able to
7 reserve a vacation spot just outside Yosemite National Park for my family starting on
8 July 27, 2013, along with another family. I have paid in advance for the location.
9 Given the high demand for Yosemite National Park locations, rescheduling the date of
10 this vacation for any other time in 2013 would be impossible.

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct.

13 Executed this 12th day of June, 2013, at Los Angeles, California.

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16 
17 _____
18 Deborah M. Parker
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EXHIBIT A



LOS ANGELES PARTNERS
GUY P. GLAZIER
DEBORAH M. PARKER

A LIMITED LIABILITY LAW PARTNERSHIP

707 WILSHIRE BOULEVARD
SUITE 2025
LOS ANGELES, CALIFORNIA 90017

SAN FRANCISCO PARTNERS
LAURA PATRICIA YEE
BRIAN T. CLARK

TELEPHONE (213) 312-9200
FACSIMILE (213) 312-9201
WWW.GLAZIERYEE.COM

June 10, 2013

Via Lexis Nexis File And Serve

Robert Green, Esq.
Simon Greenstone Panatier Bartlett, LP
301 E. Ocean Blvd., Suite 1950
Long Beach, California 90802

Re: Olds v. 3M Company, et al.;
Ex Parte Notice

Dear Mr. Green:

Lockheed Martin Corporation ("Lockheed Martin") provides notice of its intent to file an *ex parte* application on Wednesday, June 12, 2013, to continue the hearing on: 1) Plaintiff's Partial Motion for Summary Judgment; 2) Plaintiff's Motion to Compel; and 3) Lockheed Martin's Motion to Strike to August 19, 2013. The application will be made pursuant to Judge Real's procedures and schedules, paragraph 6 and U.S. District Court, Central District, Local Rule 7-19 *et seq.* Lockheed Martin bases its application on the following grounds: 1) the two Glazier Yee LLP attorneys working in the Los Angeles office have previously scheduled and paid for vacations on the current hearing date of July 29, 2013, and 2) judicial economy, because Lockheed Martin plans to file a motion for summary judgment that will address some of the same issues presented in Plaintiff's partial summary judgment motion.

If your client plans to oppose the application, please contact me by 12 p.m. on Tuesday, June 11, 2013, via email at parker@glazierye.com. Please note that your client has twenty-four (24) hours from actual receipt of the *ex parte* application to file any opposition. (See Judge Real's Procedures and Schedules, ¶ 5.)

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah M. Parker".

Deborah M. Parker

cc: All Counsel

6/10/13

File & ServeXpress

File & Serve

Welcome: Caldwell, Caroline
Glazier Yee LLP

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Home Alerts Search

6/10/13 5:40 PM PDT

Your transaction has been successfully submitted to File & ServeXpress. Your transaction information appears below. To print this information for your records, click anywhere on the transaction information, then click the browser Print button.
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To perform another transaction, click **Begin a New Transaction**.
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TIP: Receive notifications of new Filing & Service activity that match your search criteria. Click on the Alerts tab.

File & ServeXpress Transaction Receipt

Transaction ID:	52704592
Submitted by:	Caroline Caldwell, Glazier Yee LLP
Authorized by:	Deborah M Parker, Glazier Yee LLP
Authorize and file on:	Jun 10 2013 5:21PM PDT
Court:	CA US District Court Central District
Division/Courtroom:	N/A
Case Class:	Civil-Olds vs 3M Co (2:12-cv-08539-R)
Case Type:	Asbestos
Case Number:	2:12-cv-08539-R
Case Name:	Olds, Paul vs 3M Co et al
Transaction Option:	Serve Only - Public
Billing Reference:	6010332
Read Status for e-service:	Not Purchased

Documents List

1 Document(s)

Attached Document, 1 Pages Document ID: 56518156

Document Type:

Correspondence

Document title:

Ex Parte Notice

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☐ [Sending Parties \(1\)](#)

Party	Party Type	Attorney	Firm	Attorney Type
Lockheed Martin Corp	Defendant	Parker, Deborah M	Glazier Yee LLP	Attorney in Charge

☒ [Recipients \(170\)](#)

☒ [Service List \(170\)](#)

☐ [Additional Recipients \(0\)](#)

☒ [Case Parties](#)

Access:
Secure Public

Statutory Fee:
\$0.00

[PDF Format](#) | [Original Format](#)
Linked:

EXHIBIT B

Deborah Parker

From: Deborah Parker
Sent: Tuesday, June 11, 2013 10:27 AM
To: 'Rob Green'
Subject: RE: Olds - Lockheed ex parte

Rob,

The hearing date of July 29 was set last week so resolving it months ago was not a possibility. I will inform the court that you plan to oppose our application.

Thank you,

Deb

Deborah M. Parker

Glazier Yee LLP | Partner
707 Wilshire Blvd., Suite 2025
Los Angeles, California 90017

Telephone: 213-312-9200
Facsimile: 213-312-9201
Website: www.glazieryeelaw.com

From: Rob Green [<mailto:rgreen@sgpblaw.com>]
Sent: Tuesday, June 11, 2013 10:22 AM
To: Deborah Parker
Subject: Olds - Lockheed ex parte

Ms. Parker, I was told you are filing an ex parte. I don't know what the grounds are. It seems like this issue should have been resolved months ago. We intend on opposing. We also need to discuss your clients refusal to answer many of many questions at deposition and I would like to arrange a cite inspection of the library where the F-80 documents were kept.

Robert Green | Shareholder

SIMON GREENSTONE PANATIER BARTLETT
A PROFESSIONAL CORPORATION

301 East Ocean Blvd. | Suite 1950 | Long Beach, California 90802
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the below noted date, the
aforementioned document was electronically filed with the Clerk of the Court of the
United States District Court, Central District of California using the ECF system which
sent notification of such filing to all counsel of record. This document is now
available for viewing and downloading from the ECF system.

Dated: June 12, 2012

/s/ Deborah M. Parker
Deborah M. Parker (SBN 228203)
Glazier Yee LLP
707 Wilshire Boulevard, Suite 2025
Los Angeles, California 90017
(213) 312-9200
parker@glazieryeelaw.com

Attorneys for Defendant
LOCKHEED MARTIN CORPORATION